

Edward C. Bertucio, Jr., Esq. (ECB 6435)
HOBBIE, CORRIGAN, BERTUCIO & TASHJY, P.C.
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(732) 380-1515
Attorneys for Defendant, Michael Alfieri, Esq.

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

WALSH SECURITIES, INC.

Plaintiff,

v.

CRISTO PROPERTY MANAGEMENT,
LTD., A/K/A G.J.L. LIMITED, DEK HOMES
OF NEW JERSEY, INC., OAKWOOD
PROPERTIES, INC., NATIONAL HOME
FUNDING, INC., CAPITAL ASSETS
PROPERTY MANAGEMENT &
INVESTMENT CO., INC., CAPITAL
ASSETS PROPERTY MANAGEMENT,
L.L.C., WILLIAM J. KANE, GARY
GRIESER, ROBERT SKOWRENSKI, II,
RICHARD CALANNI, RICHARD
DIBENEDETTO, JAMES R. BROWN,
THOMAS BRODO, RONALD J. PIERSON,
STANLEY YACKER, ESQ., MICHAEL
ALFIERI, ESQ., RICHARD PEPSNY, ESQ.,
ANTHONY M. CICALESE, ESQ.,
LAWRENCE J. CUZZI, ANTHONY
D'APOLITO, DAP CONSULTING, INC.,
COMMONWEALTH LAND TITLE
INSURANCE COMPANY, NATIONS TITLE
INSURANCE OF NEW YORK, INC.,
FIDELITY NATIONAL TITLE INSURANCE
COMPANY OF NEW YORK, COASTAL
TITLE AGENCY, STEWART TITLE
GUARANTY COMPANY, IRENE DIFEO,
DONNA PEPSNEY, WEICHERT
REALTORS, AND VECCHIO REALTY,
INC. D/B/A MURPHY REALTY BETTER
HOMES AND GARDENS,

Defendants.

Civ. No. 97-3496 (WGB)

**DEFENDANT ALFIERI'S NOTICE OF
MOTION COMPELLING THE
PRODUCTION OF PLAINTIFF'S
DISCOVERY RESPONSES PURSUANT
TO FED.R.CIV.P. 37(a)2**

To: Civil Motions Clerk
United States District Court
District of New Jersey
MLK Federal Building and US Courthouse
50 Walnut Street
Newark, New Jersey 07102

Honorable William G. Bassler, U.S.D.J.
United States District Court
District of New Jersey
MLK Federal Building and US Courthouse
50 Walnut Street, Room 5060
Newark, New Jersey 07102

Honorable Madeline Cox Arleo, U.S.D.J.
United States District Court
District of New Jersey
MLK Federal Building and US Courthouse
50 Walnut Street, Room 5060
Newark, New Jersey 07102

Attached counsel list

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned, counsel for Michael Alfieri, Esq., shall move before the Honorable William G. Bassler, U.S.D.J., for an order Compelling the production of Plaintiff's Discovery responses.

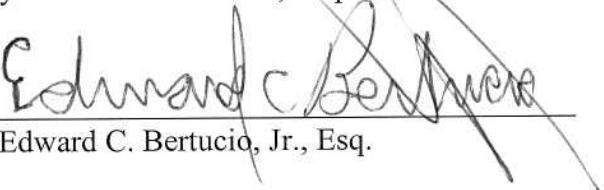
In support of the foregoing motion, counsel for Mr. Alfieri, Esq. shall rely upon the attached attorney's certification.

A proposed form of order is attached as well.

HOBBIE, CORRIGAN, BERTUCIO & TASHJY, P.C.
Attorneys for Michael Alfieri, Esquire

Dated: 8/29/05

By:


Edward C. Bertucio, Jr., Esq.

Edward C. Bertucio, Jr., Esq. (ECB 6435)
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ANTHONY M. CICALESE, ESQ.,
LAWRENCE J. CUZZI, ANTHONY
D'APOLITO, DAP CONSULTING, INC.,
COMMONWEALTH LAND TITLE
INSURANCE COMPANY, NATIONS TITLE
INSURANCE OF NEW YORK, INC.,
FIDELITY NATIONAL TITLE INSURANCE
COMPANY OF NEW YORK, and COASTAL
TITLE AGENCY,

Defendants.

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that an original and two (2) copies of the within Notice of Motion, was on this date electronically filed with the Civil Motions Clerk of the United States District Court, District of New Jersey, MLK Federal Building and US Courthouse, 50 Walnut Street, Newark, New Jersey 07102; and that true copies have been served upon the following parties, all via electronic filing and regular mail:

Honorable William G. Bassler, U.S.D.J.
United States District Court
District of New Jersey
MLK Federal Building and US Courthouse
50 Walnut Street, Room 5060
Newark, New Jersey 07102

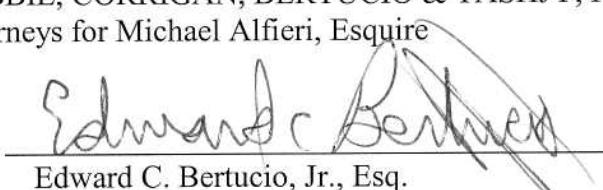
Honorable Madeline Cox Arleo, U.S.D.J.
United States District Court
District of New Jersey
MLK Federal Building and US Courthouse
50 Walnut Street, Room 5060
Newark, New Jersey 07102

All attorneys on attached counsel list.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

HOBBIE, CORRIGAN, BERTUCIO & TASHJY, P.C.
Attorneys for Michael Alfieri, Esquire

Dated: 8/29/05

By: 
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